

ADDITIONAL EXCERPTS FROM  
PLAINTIFF'S DEPOSITION

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA  
Civil Action No.: 1:21-cv-814

LARISSA HARPER HAIRGROVE, )  
                                  )  
                                  Plaintiff, )  
                                  )  
                                  vs. )  
                                  )  
CITY OF SALISBURY, DOWNTOWN )  
SALISBURY INC., and LANE )  
BAILEY, in his individual and )  
official capacity, )  
                                  )  
                                  Defendants. )  
                                  )  
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DEPOSITION  
OF  
LARISSA HARPER HAIRGROVE

TAKEN AT THE OFFICES OF:  
GATEWAY BUILDING  
204 EAST INNES STREET, SUITE 200  
2ND FLOOR CONFERENCE ROOM  
SALISBURY, NC 28144

02-22-2023  
9:54 O'CLOCK A.M.

Gretchen Wells  
Court Reporter

Chaplin & Associates  
132 Joe Knox Ave, Suite 100-G  
Mooresville, NC 28117  
(704) 606-1434 | (336) 992-1954 | (919) 649-4444

1 here in this lawsuit?

2 A. I think that he could see the pressure I was  
3 under from both sides, as a DSI board member and  
4 promotions chair. He spent a lot of time with me and  
5 Latoya, and prior to Latoya, Katelin Rice. And he  
6 went to almost every committee meeting other than his  
7 own. And I believe he understood that I was under  
8 pressure.

9 And he went to some point towards the --  
10 before I was constructively discharged, I'll call it,  
11 since one of the board members told me to look that up  
12 and see what that's all about because that's -- kind  
13 of seemed what was going on. He went and talked to  
14 Lane and Zack about kind of how he saw things.

15 Q. When did he do this?

16 A. It was probably in March or April, maybe  
17 May.

18 Q. So the spring of 2020?

19 A. Yes.

20 Q. Would that be fair?

21 A. Uh-huh (yes).

22 Q. Okay. And how do you know that he went and  
23 talked to Zack and Lane?

24 A. Because he communicated that to me.

25 Q. He came back and told you, "I talked to Zack

1           **A.    Right.**

2           Q.    Okay.  And so ---

3           A.    I think I heard that right.  I'm sorry.  I'm  
4  waning.  I'm starting to wane.  You all are probably  
5  too, but...

6           Q.    You didn't have Outlook -- access to Outlook  
7  calendars for the last year of your employment when  
8  you created that log of hours you say you're due?

9           A.    **After I was constructively discharged, I did  
10 not have access.**

11          Q.    Okay.  So you ---

12          A.    **Only whenever I worked for Salisbury did I  
13 have access.**

14          Q.    Okay.  So what I understand you're saying is  
15  that you used emails and text messages to create that  
16  log?

17          A.    **To -- yeah, identify the times I was ---**

18          Q.    Okay.  And you created that on your own  
19  computer ---

20          A.    **Yeah.**

21          Q.    --- at home?

22          A.    **Uh-huh (yes).**

23          Q.    And it was a Word document?

24          A.    **Yes.**

25          Q.    Okay.  And you say that you start -- so when